

**REMARKS**

The rejection of claims 1-18 and 21-53 based upon the existence of errors and informalities are believed to have been overcome in the amendment of claims 1, 4-8, 10-18 and 19-53 respectively. Accordingly, the objections to the claims should be withdrawn.

The rejection of claims 39-41 under 35 USC 101 as being directed to non-statutory subject matter of software per se is respectfully traversed.

Claims 39-41 have been amended to recite an executable computer program which is stored in a computer readable medium of digital data reception equipment comprising a computer for executing the computer program in accordance with program instructions which are specifically defined. Accordingly, the rejection of claims 39-41 under 35 USC 101 should be withdrawn.

The rejection of claims 1-18 and 21-53 under 35 USC 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention is respectfully traversed.

The term "on the fly" has been deleted from the claims. In addition, the term "and/or" has also been deleted from the claims. In addition, the claims have been amended to recite the words "digital data" before the words -reception equipment- as pointed out by the Examiner. In addition, each of the claims have been carefully reviewed and amended to be consistent with US practice and to avoid indefinite terms. Applicant now believes that all of the objected to terminology has been

corrected and that appropriate antecedent basis has been used to support the terms in all of the dependent claims. Accordingly, the rejection of the claims under 35 USC 112, should now be withdrawn.

The rejection of claims 1-18 and 21-53 under 35 USC 102(b) as being anticipate by USP 6,405,369 to Tsuria is respectfully traversed.

Applicant has amended independent claim 1 to a method for an operator to dynamically and remotely control the pairing of digital data reception equipment with one or more external security modules each having a unique identifier and specifically requires use of a computer in the digital data reception equipment to execute a computer program which includes instructions for verifying whether or not the unique identifier in the external security module is memorized in the digital data reception equipment upon connection of the external security modules to the digital data reception equipment and depending upon the result of this verification step the operator transmits a control signal to either activate or deactivate the pairing of the digital data reception equipment with the security modules. This is neither taught or suggested in the cited reference Tsuria.

Independent claim 29 is directed to reception equipment for pairing to one or more external security modules each having a unique identifier to manage access to digital data distributed by an operator and comprises means for executing a computer program stored in a readable medium for verifying whether or not the identifier in said security modules is already memorized in the reception equipment upon connection of said external security modules to the reception equipment,

activating the pair of digital data reception equipment with said external security modules if the unique identifier of the external security modules is already memorized in the reception equipment and deactivating the pairing of said digital data reception equipment with said external security modules if the unique identifier in the external security modules is not already memorized in the reception equipment.

Accordingly, since these features are not taught in the cited reference Tsuria, the rejection of claim 29 under 35 USC 102 should be withdrawn. Claims 30-32 depend from claim 29 and are therefore believed patentable for the same reasons as given above.

Likewise, claim 33, which is independent, has also been amended in a manner similar to that of claim 29 and accordingly, for the same reasons as given above, claim 33 is clearly patentable over the cited reference Tsuria and the rejection under 35 USC 102 should be withdrawn.

Claims 34 and 35 are dependent upon claim 33 and are therefore believed patentable for the same reasons as given above.

The removable security interface claimed in claim 36 specifically claims a non-volatile memory which cooperates with digital data reception equipment having a decoder and includes a plurality of conditional access control cards with each access control card having a unique identifier and containing information about access rights of a subscriber to said digital data and with the interface further

comprising means for recording the identifier of each access control card in said non-volatile memory and at least one data processing algorithm for use by the decoder to activate or deactivate the pairing of the reception equipment to the control cards. Accordingly, claim 36 is clearly patentable over the teaching in Tsuria and the rejection under 35 USC 102 should be withdrawn.

Claims 38 and 39 depend from claim 36 and are therefore believed patentable for the same reasons as given above.

Claim 39 now recites an executable computer program stored in a computer readable medium of a reception equipment with the reception equipment comprising a computer for executing the executable computer program and with the executable computer program including instructions for verifying whether or not the identifier in said external security modules is already memorized in the reception equipment upon connection of the external security modules to the reception equipment, activating the pairing of the digital data reception equipment with the external security modules if the unique identifier in the security modules is already memorized in the digital data reception equipment and deactivating the pairing of said decoder with said security modules if the unique identifier in the security modules is not already memorized in the decoder. Accordingly, claim 39 is now clearly believed to be patentable over the teaching in Tsuria and the rejection under 35 USC 102(b) should be withdrawn.

Claims 40 and 41 are dependent claims depending from claim 39 and are therefore believed to be patentable for the same reasons as given above.

Claim 42 claims a system comprising a management platform 1 and a digital data reception equipment 2 connected to a service broadcasting network for communicating with the digital data reception equipment and with the digital data reception equipment being paired with a plurality of external security modules each having a unique identifier wherein the system further comprises a first module arranged in the management platform that will generate pairing queries and a second module arranged in the digital data reception equipment that will process the queries generated in the first module for preparing a pairing configuration to control the pairing using pairing control parameters generated by a computer in said digital data reception equipment based upon verifying whether or not the identifier of said external said security modules is already memorized in the digital data reception equipment upon connection of said external modules to the digital data reception equipment for activating or deactivating the pairing. Accordingly, the system as now claimed in claim 42 is believed to be clearly patentable over the teaching of Tsuria under 35 USC 102(b) and the rejection should be withdrawn.

Claims 43-53 are all dependent claims which depend from the method of claim 1 and are therefore believed patentable for the same reasons as given above relative to method claim 1.

For all of the above reasons the rejections of claims 1-18 and 21-53 under 35 USC 102(b) should be withdrawn.

**CONCLUSION**

Reconsideration and allowance of claims 1, 4-8, 10-18 and 19-53 is respectfully solicited.

Respectfully submitted,



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**CERTIFICATE OF TRANSMISSION**

I hereby certify that this Amendment is being submitted to the USPTO via EFS Web addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria VA 22313-1450, on August 3, 2009.

By



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